

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

PAMELA WOLOSKY,	:	Civil Action No. 2:14-cv-00804-NBF
	:	
Plaintiff,	:	JURY TRIAL DEMANDED
vs.	:	
	:	
	:	
TRINITY AREA SCHOOL DISTRICT,	:	
PAUL KASUNICH, AMY MCTIGHE,	:	
	:	
Defendants.		

**DEFENDANT’S MOTION FOR LEAVE TO FILE A REPLY TO PLAINTIFFS’
NOTICE OF SUPPLEMENTAL AUTHORITY IN SUPPORT OF PLAINTIFF’S
RESPONSE IN OPPOSITION TO DEFENDANTS’ MOTION TO DISMISS**

Defendants Trinity Area School District, Dr. Paul Kasunich, and Amy McTighe by and through their attorneys, John Smart, Esquire and the law firm of Andrews & Price, LLC file the following Motion for Leave to File a Reply to Plaintiffs’ Notice of Supplemental Authority in Support of Plaintiff’s Response in Opposition to Defendants’ Motion to Dismiss [attached hereto as Exhibit A] averring as follows:

1. On October 29, 2014, Plaintiff filed a Notice of Supplemental Authority in Support of Plaintiff’s Response in Opposition to Defendants’ Motion to Dismiss [Doc. 16].
2. Plaintiff did not seek leave of Court to file a Notice of Supplemental Authority.
3. Plaintiff’s Notice of Supplemental Authority raises a long-standing theory of liability, rather than a new theory.

4. Plaintiff's Notice also contains matters not initially addressed in Plaintiff's Response in Opposition to Defendants' Motion to Dismiss [Doc. 14].

5. Defendants request leave to file a Reply to Plaintiffs' Notice of Supplemental Authority in Support of Plaintiff's Response in Opposition to Defendants' Motion to Dismiss, attached hereto as "Exhibit A".

WHEREFORE, Defendants Trinity Area School District, Dr. Paul Kasunich, and Amy McTighe respectfully request that this Honorable Court grant their request for leave to file a Reply.

Respectfully submitted,

ANDREWS & PRICE

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